

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA, derivatively on behalf of
LINK MOTION INC. (F/K/A NQ MOBILE INC.)

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),
VINCENT WENYONG SHI, JIA LIAN, XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),

Nominal Defendant.

1:18-cv-11642-VM-DCF

**DECLARATION OF
MARK RUSSELL**

Mark Russell declares, pursuant to 28 U.S.C. 1746, as follows:

1. I am an attorney duly admitted to practice law in the Cayman Islands. I am counsel to Robert Seiden (the “Receiver”) in his capacity as the temporary receiver over Link Motion Inc. (“LKM” or the “Company”) pursuant to this Court’s Receivership Order dated February 1, 2019 (Dkt. No. 26). Attached to this declaration are certain filings (described below) that my office made in the Cayman Islands pursuant to the Receiver’s direction that are relevant to the Receiver’s Response to Defendant Vincent Wenyong Shi’s Order to Show Cause to Enjoin Extraordinary General Meetings and Strike Proposed Shareholder Resolutions. (Dkt. No. 276).

2. Annexed hereto as **Exhibit A** is a true and correct copy of the Summons submitted to the Registrar of the Financial Services Division of the Grand Court of the Cayman Islands on February 7, 2022.

3. Annexed hereto as **Exhibit B** is a true and correct copy of the Fourth Affidavit of Robert W. Seiden submitted to the Financial Services Division of the Grand Court of the Cayman Islands on February 7, 2022.

4. Annexed hereto as **Exhibit C** is a true and correct copy of Exhibit RWS-4 in support of the Fourth Affidavit of Robert W. Seiden submitted to the Financial Services Division of the Grand Court of the Cayman Islands on February 7, 2022.

5. Annexed hereto as **Exhibit D** is a true and correct copy of the Fifth Affidavit of Robert W. Seiden submitted to the Financial Services Division of the Grand Court of the Cayman Islands on February 9, 2022.

6. Annexed hereto as **Exhibit E** is a true and correct copy of Exhibit RWS-5 in support of the Fifth Affidavit of Robert W. Seiden submitted to the Financial Services Division of the Grand Court of the Cayman Islands on February 9, 2022.

7. Annexed hereto as **Exhibit F** is a true and correct copy of the Receiver's Skeleton Argument submitted to the Financial Services Division of the Grand Court of the Cayman Islands on February 18, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: March 21, 2022


Mark Russell